



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10
1200 Sixth Avenue
Seattle, WA 98101

October 23, 2000

Reply To
Attn Of: ECL - 115

Colonel Randall J. Butler
District Engineer
Portland District, Corps of Engineers
P.O. Box 2946
Portland, Oregon 97208

RE: North Pacific Division Laboratory, Troutdale, Oregon
(CERCLIS ID # OR1210800032)

Dear Colonel Butler:

This letter is to inform you of the Environmental Protection Agency (EPA's) decision to rescind the No Further Remedial Action Planned (NFRAP) designation for the North Pacific Division Laboratory site, and to request that the U.S. Army Corps of Engineers (COE) perform additional environmental investigation at the site. EPA will use the results of the investigation to reevaluate the site using the Hazard Ranking System (HRS), in accordance with 40 CFR Part 300 Appendix A. The HRS is used to evaluate federal facilities for inclusion on the National Priorities List (NPL).

EPA's request is based on our recent review of the COE's response to our February 9, 2000 request for information under section 104 (e) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Our review raised serious concerns regarding the waste handling and disposal practices at the laboratory. In addition, we are concerned that the COE failed to notify EPA about ongoing contaminant releases from the site. Section 103 (c) of CERCLA and Section 120, which establishes the Federal Agency Hazardous Waste Compliance Docket, sets forth the COE's responsibilities. The notification of a release or a potential to release pertains to any site under the direct jurisdiction, custody or control of the federal government including both government owned and operated, and also government owned and privately operated facilities.

Previous Investigations

On November 13, 1992, EPA designated the site as NFRAP. This decision was based on a June 24, 1991 Preliminary Assessment (PA) submitted by the COE. However in our letter to the COE we stated that "if new or additional information becomes available that suggests your facility may score high enough to be proposed for the NPL, EPA must reevaluate your facility accordingly."

Based on the information recently submitted, in response to the 104 (e) request, it appears that the PA submitted on June 24, 1991 did not identify many serious hazardous waste handling and disposal practices that were being used at the laboratory. Some of these practices include the discharges of lab drains to an onsite ditch, use of a dry well for laboratory discharges, and the potential for hazardous substance disposal into an on site landfill. Furthermore, in 1995, the COE's internal quality control auditors discovered the inappropriate disposal practices, and yet the COE

again failed to notify EPA of this "new" information as required by CERCLA and as requested by our NFRAP letter of 11/13/92. The COE subsequently conducted an independent cleanup action at the site. This information only came to light after an anonymous complaint was filed with the Region which initiated our 104 (e) request, to the COE, in February 2000.

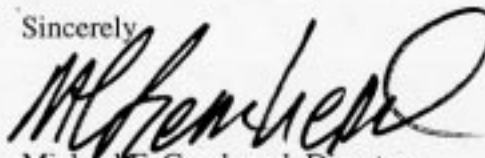
Next Steps

Our review of the new information raised concerns regarding the possibility of continuing releases from the site. As a result of EPA's review of the new information, EPA will remove the NFRAP designation for the facility and requests the following information:

- Additional confirmation sampling around and beneath both the ditch and dry well removal excavations. These removals are documented in the Final Cleanup Report - Soil Removal and Groundwater Sampling - North Pacific Division Laboratory, Tetra Tech, 1999. Samples should be analyzed for the complete Target Compound List and the complete Target Analyte List (TCL/TAL).
- Exploratory excavations within the landfill to determine the types of waste disposed and need for a removal action. Collect soil samples from each excavation and analyze the samples for the TCL/TAL. Installation of additional monitoring wells may also be necessary at this location.
- Sample the drainage route to the Sandy River. Collect sediment samples from the Sandy River at the location of discharge of overland flow from the laboratory into the river. Collect up to six sediment samples downstream of the probable point of entry.
- Collect background samples for all media sampled and analyzed for the complete TCL/TAL.

Mark Ader of my staff has been working with Mike Gross of your staff regarding the laboratory. Mr. Ader can be reached at 206-553-1808. Mr. Ader would like to meet with your staff in Portland to discuss the details of the sampling approach and tour the site prior to finalizing the field work requirements.

Sincerely,



Michael F. Gearheard, Director
Environmental Cleanup Office

CC: Gil Wistar, ODEQ
Mike Gross, COE